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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

No. 3:20-cr-00467-IM

Plaintiff,

v.

**DECLARATION OF COUNSEL IN
SUPPORT OF UNOPPOSED MOTION
TO CONTINUE TRIAL DATE**

MICHAEL LEE PILGRIM,

Defendant.

I, Fidel Cassino-DuCloux, declare:

1. I am counsel of record in this matter for the defendant, Michael Lee Pilgrim.
2. A continuance of the current trial date of March 2, 2021, to a date at least 90 days from the present setting is necessary as more time is required to continue discovery review, identify necessary research and investigation tasks to be conducted, consult with and effectively advise Mr. Pilgrim, and adequately prepare the case.

3. I have spoken with the defendant and explained the reasons for requesting a continuance and his rights under the Speedy Trial Act. Mr. Pilgrim agrees with the reasons for the continuance and waives his rights to a speedy trial.

4. Assistant United States Attorney Gregory Nyhus has been contacted and does not object to this continuance.

5. This declaration is made in good faith and in support of the motion for continuance of the trial date in this case.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on February 17, 2021, in Portland, Oregon.

/s/ Fidel Cassino-DuCloux
Fidel Cassino-DuCloux
Assistant Federal Public Defender